

S. AMANDA MARSHALL, OSB #95347
United States Attorney
District of Oregon
STACIE F. BECKERMAN, OSB #06239
Assistant United States Attorney
Stacie.Beckerman@usdoj.gov
1000 S.W. Third Ave., Suite 600
Portland, OR 97204-2902
Telephone: (503) 727-1000
Facsimile: (503) 717-1117
Attorneys for United States of America

THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA

Case No. 3:14-CR-00027-SI

v.

**GOVERNMENT'S SENTENCING
MEMORANDUM**

JERMAINE HANKINS,

Defendant.

The United States of America, by S. Amanda Marshall, United States Attorney for the District of Oregon, through Stacie Beckerman, Assistant United States Attorney, respectfully submits this sentencing memorandum for the Court's consideration.

On June 2, 2014, defendant Jermaine Hankins pleaded guilty to traveling with the intent to promote an unlawful activity (money laundering), in violation of 18 U.S.C. § 1952(a)(3) (the Travel Act). For the reasons discussed herein, the government respectfully recommends that the Court sentence defendant to serve a two-year term of probation, to include a community service requirement.

I. FACTUAL BACKGROUND

The offense conduct is accurately set forth in the Presentence Report (PSR).

II. PRESENTENCE REPORT

The Presentence Report accurately calculates the advisory sentencing guidelines calculation.

III. GOVERNMENT'S SENTENCE RECOMMENDATION

The government is recommending a sentence less than the sentences typically imposed in similar cases in this district. That is because in the course of the undercover investigation described in the PSR, the undercover agent learned, and believed, that Mr. Hankins had finally made meaningful changes in his life, and that he was no longer engaged in the charged criminal activity. As a result, the government does not believe that a prison term is necessary to deter Mr. Hankins from engaging in future unlawful activity.

Although deterrence is not the only goal of our criminal justice system, the government believes that the other goals at sentencing are satisfied in this case with a felony conviction and a term of probation. Sending Mr. Hankins to prison will only serve to disrupt his recent progress. As described in more detail in Mr. Hankins' sentencing materials, he seems to have turned a corner in his life. Mr. Hankins is now a productive member of our community who is using his time to serve others, and to keep others from making the same mistakes he made as a young man.

///

///

///

For all of the reasons discussed herein, the government respectfully recommends that the Court sentence Mr. Hankins to serve a 2-year term of probation, subject to the special conditions of release recommended in the PSR.

Respectfully submitted this 1st day of October 2014.

S. AMANDA MARSHALL
United States Attorney
District of Oregon

/s/ *Stacie F. Beckerman*
STACIE F. BECKERMAN
Assistant United States Attorney